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April 29, 2025

VIA EMAIL & ECF

Hon. Katharine H. Parker
United States Magistrate Judge
Southern District of New York
500 Pearl Street, Room 750
New York, New York, 10007

Re: **Andrew Delancey v. Justin Wells and Fox News Network, LLC, Case No. 1:23-cv-10357-AT-KHP**

Dear Judge Parker:

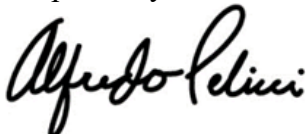
We represent Plaintiff Andrew Delancey (“Plaintiff” or “Mr. Delancey”) in the above-referenced matter and write jointly with Defendants Justin Wells and Fox News Network, LLC to provide a status report prior to the status conference scheduled before Your Honor on May 6, 2025.

On April 8, 2025, counsel for the parties held a meet and confer to address discovery disputes concerning Defendants’ discovery responses and productions that were not addressed by Defendant Fox News Network LLC’s motion for a protective order (Dkt. No. 58). The parties successfully reached a compromise and, as such, Plaintiff did not raise additional disputes with the Court.

Given the Court’s position in the Court’s order concerning Defendants’ motion for a protective order that, “[s]hould damages discovery be warranted at a later stage, Plaintiff may apply to the Court to obtain information relevant to potential liability of Fox Corp. for any judgment against Fox News on the claims” (Dkt. No. 78 at p. 17), Plaintiff decided not to further pursue amendments to his complaint to seek to add Fox Corporation as a party.¹ The parties agreed that Defendant Fox News Network, LLC’s answer will be due on May 9, 2025.

Defendants anticipate making an initial production consistent with the Court’s April 4, 2025 order concerning Fox News Network LLC’s motion for a protective order in advance of the May 6, 2025 conference. The parties will also work to schedule depositions.

Respectfully Submitted,



Alfredo J. Pelicci

¹ Defendant Fox News Network, LLC reserves all rights to oppose any such discovery.